



The American Boiler Manufacturers Association (ABMA), representing over 100 small-business manufacturer and supplier companies in 24 states – including many domestic manufacturers of economizers used in a wide and diverse range of applications -- strongly opposes H. R. 5221 as an ill-advised and ill-timed assault on not only American economizer manufacturers but on their employees, and the American boiler industry and its customers in general.

Actively engaged in the design and fabrication of commercial, institutional, industrial, heat recovery and electricity-generating boiler and combustion equipment – generating steam and hot water for myriad uses throughout the U.S. economy -- many of our ABMA member companies also design and manufacture economizers. Many others in our membership may not manufacture their own economizers but do rely on other domestic economizer suppliers to provide them with quality and affordable components that go to make up their overall boiler system.

Affecting too many economizer applications and market segments, H. R. 5221 is an overly-broad effort, in the absence of any hearings or otherwise-identified need to the contrary, to alter tariff policy that has long been successfully in place. To provide import advantages, however small and/or temporary, to foreign economizer manufacturers at this time of U. S. economic recovery and increasing demand for reductions in domestic U. S. energy use alters the competitive playing field, puts U. S. manufacturers at a disadvantage, is counterintuitive and will only serve to negatively affect job maintenance and creation at a time when we can ill-afford it.

Again, this Association is unaware of any evidence that points to any identified need for economizers for use in common central heating applications over and above that which can be effectively and sustainably satisfied by domestic U. S. economizer manufacturers currently providing high-quality, code-based, affordable products. To our knowledge and experience, there are currently sufficient resources available in the domestic U.S. market place to satisfy all economizer needs in a timely and affordable manner. Economizer deliveries are all within a normal range, and there is nothing that presages any other conditions in the near future that existing domestic economizer manufacturers cannot successfully address again in a timely and affordable manner while creating valuable employment and tax-base contributions all across the United States.

The American Boiler Manufacturers Association urges Congress not to pass H. R. 5221, to leave current tariff policy as it pertains to economizers for use with boilers of heading 8402 or 8403 (provided for in subheading 8404.10.00) unchanged, and to support American manufacturing and the many jobs it maintains.

Further information on members of the American Boiler Manufacturers Association and the various products and services they provide can be found at <http://www.abma.com> and by downloading ABMA's *Directory of Members' Products and Services* – a pdf-searchable document.

Sincerely,

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